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Counsel for Plaintiffs

**IN THE DISTRICT COURT OF THE FOURTH JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF ADA**

ST. LUKE'S HEALTH SYSTEM, LTD; ST. LUKE'S REGIONAL MEDICAL CENTER, LTD; CHRIS ROTH, an individual; NATASHA D. ERICKSON, MD, an individual; and TRACY W. JUNGMAN, NP, an individual,

Plaintiffs,

vs.

AMMON BUNDY, an individual; AMMON BUNDY FOR GOVERNOR, a political organization; DIEGO RODRIGUEZ, an individual; FREEDOM MAN PRESS LLC, a limited liability company; FREEDOM MAN PAC, a registered political action committee; and PEOPLE'S RIGHTS NETWORK, a political organization,

Defendants.

Case No. CV01-22-06789

MOTION FOR CONTEMPT AGAINST AMMON BUNDY, PEOPLE'S RIGHTS NETWORK, AND AMMON BUNDY FOR GOVERNOR

Plaintiffs, St. Luke's Health System, Ltd., St. Luke's Regional Medical Center, Ltd., Chris Roth, Natasha D. Erickson, M.D., and Tracy W. Jungman, NP ("Plaintiffs"), by and through their attorneys of record, Holland & Hart LLP, hereby move this Court to hold Ammon Bundy, Ammon Bundy for Governor and People's Rights Network in contempt pursuant to Idaho Code § 7-601 *et seq.* and Idaho Rule of Civil Procedure 75.

Plaintiffs seek their reasonable costs and attorney fees incurred in prosecuting the contempt proceedings under Idaho Rule of Civil Procedure 75(m).

This Motion is supported by the pleadings and documents on file herein, along with the Memorandum in Support of Motion for Contempt and the Affidavit of Jennifer Jensen filed contemporaneously herewith.

Oral argument is requested.

DATED: October 20, 2023.

HOLLAND & HART LLP

By: /s/ Erik F. Stidham
Erik F. Stidham
Counsel for Plaintiffs

MOTION FOR CONTEMPT AGAINST AMMON BUNDY, PEOPLE'S RIGHTS NETWORK, AND AMMON BUNDY FOR GOVERNOR - 2

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of October, 2023, I caused to be filed and served, via iCourt, a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Ammon Bundy for Governor
People's Rights Network
c/o Ammon Bundy
P.O. Box 370
Emmett, ID 83617

U.S. Mail
 Hand Delivered
 Overnight Mail
 Email/iCourt/eServe: aebundy@bundyfarms.com

Ammon Bundy
Ammon Bundy for Governor
People's Rights Network
c/o Ammon Bundy
4615 Harvest Ln.
Emmett, ID 83617-3601

U.S. Mail
 Hand Delivered
 Overnight Mail
 Email/iCourt/eServe:

Freedom Man PAC
Freedom Man Press LLC
c/o Diego Rodriguez
1317 Edgewater Dr., #5077
Orlando, FL 32804

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 Hand Delivered
 Overnight Mail
 Email/iCourt/eServe:

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/s/ Erik F. Stidham

Erik F. Stidham
OF HOLLAND & HART LLP

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NETWORK, AND AMMON BUNDY FOR GOVERNOR - 3